

Foundational Supports for
children with developmental
concern,
delay and/or disability
and their families, carers, kin
and
General Foundational Supports

Response to consultation papers

December 2024

Early Childhood Intervention Australia Victoria/Tasmania (ECIA VIC/TAS) is the peak body representing Early Childhood Intervention Services in Victoria and Tasmania. ECIA VIC/TAS members are drawn from a diverse range of sectors including Early Childhood Intervention, Early Childhood Education and Care, Pre-School Field Officers, students, and parents/carers/kin. We are the leading voice in Victoria and Tasmania for professionals, children and families accessing Early Childhood Intervention supports. We advocate for inclusion and participation in family and community life for all children with developmental concerns, delay or disability. ECIA VIC/TAS are members of the Australian Child and Family Supports Alliance (ACaFSA) and chair the Victorian Child and Family Supports Alliance (VCaFSA).

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ECIA VIC/TAS acknowledges the traditional custodians of the lands and pays respect to elders past and present. We pay respects to Aboriginal and Torres Strait Islander children, their families, and we commit to creating a future where every child is valued, safe and an empowered member of their community.

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Introduction

With the introduction of the NDIS, the funding of disability services changed dramatically. The move from block funding, to an individualized insurance model, has led to changes in the way children and families choose and access services. This in turn has led to service providers needing to alter their operating models and service offerings in order to remain relevant and sustainable in the new ecosystem. It should be noted that prior to the NDIS, providers navigated multiple funding streams and models including Helping Children with Autism and Better Start alongside block funding.

As planning for Foundational Supports is undertaken, it must be with consideration to current reforms and existing frameworks. A clear distinction exists between inclusive education reforms and Foundational Supports. Foundational Supports will encompass both mainstream and community settings, with the education reforms focusing on creating inclusive education settings for all children, not just those with developmental delay or disability¹. There is an exciting opportunity for Foundational Supports and inclusive education to work in tandem to provide holistic support to children and families.

ECIA VIC/TAS promotes the use of Best Practice approaches as described by the National Guidelines for Early Childhood Intervention, 2016². ECIA VIC/TAS has participated in the consultation process to review these guidelines, funded by the Department of Social Services and completed by the consortium of which PRECI are a member. ECIA VIC/TAS looks forward to the findings and recommendations from their review. As a membership-based organisation, we hear directly from members, the challenges they face. At our monthly forums and through consultation, members share anecdotal data both from the perspective of service provider and the children and families in their services. ECIA VIC/TAS are in a unique position, in hearing all sides of the story and the challenges the current funding and service delivery models present. ECIA VIC/TAS welcomed the opportunity to contribute to the consultations and submission process run by the Department of Social Services. The recommendations in this submission have been identified by members of ECIA VIC/TAS for this submission.

ECIA VIC/TAS anticipates the following outcomes for children and families, as a result of the introduction of Foundational Supports:

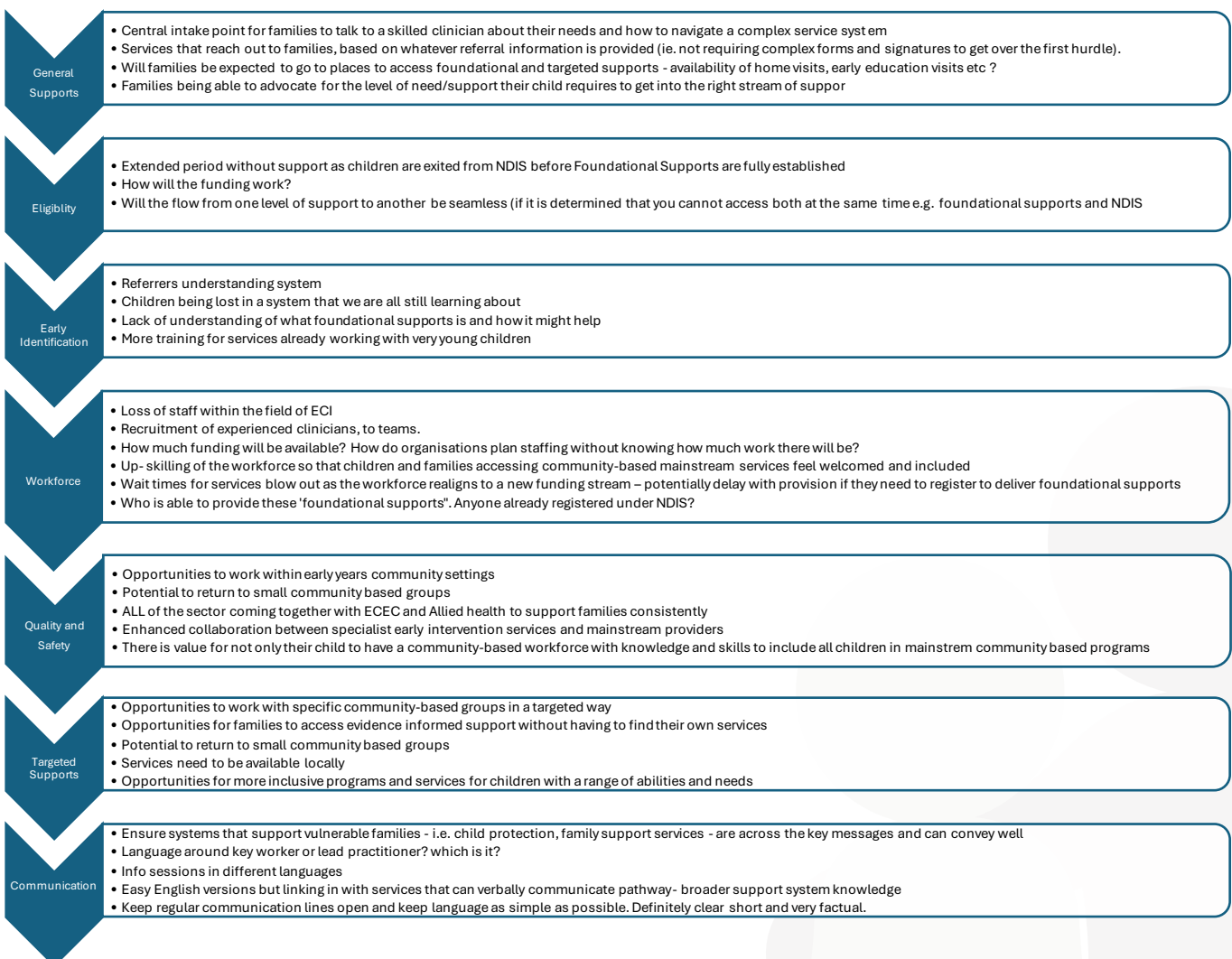
- Families be empowered to choose supports that benefit their child and family structure
- Families be empowered to advocate for their child and family needs
- Children and families access services and supports as they need them
- Children and families access supports in a timely manner
- As a child needs more, a child receives more and the level of expertise matches this
- A highly skilled and experienced workforce delivers Foundational Supports at all levels
- All communities have equitable access to supports irrespective of geographic location
- Children and families experiencing vulnerabilities have tailored supports to meet their unique needs
- Ongoing committed funding to guarantee long term outcomes
- A connected system of supports that spans health, education, Foundational Supports and NDIS that allows families to move easily through the systems as needed

¹ Based on comments contained in an unpublished document (2024) Foundational Supports vs Inclusive Education: Differentiating their roles, prepared by John Forster, CEO Noah's Ark, prepared for VCaFSA

² Early Childhood Intervention Australia (2016), National Guidelines Best Practice in Early Childhood Intervention [ECIA National Guidelines: Best Practice in Early Childhood Intervention | Department of Social Services](#)

Key themes from our members

ECIA VIC/TAS has consulted widely with its membership across Victoria and Tasmania on both general and targeted foundational supports, and focused on areas including; barriers, risk, service design and opportunities. Below is a snapshot of their thinking and comments.



General Supports

The NDIS review highlighted the challenges and barriers to accessing information and services for children and families. With the NDIS being seen as the only option, and community-based supports disappearing, families are no longer able to choose a variety of service types. It has become a one-size-fits-all approach, in contrary to the principle of choice and control within the NDIS.

Within the community there are many pathways or touchpoints a family may encounter when beginning to seek information or assistance for their child, including Maternal Child Health Nurses (MCHN), GPs, early childhood education, and playgroups.

There are many families that are able to access information and linkages from these initial touch point services. However, there are many that do not. This fragmentation and inconsistency within these services can lead to disengagement from services, with children not getting the input they need. It is not enough to just provide information, support to connect and begin services are required to ensure no child is left behind.

Recommendations:

- Establish clear pathways for all referring touch-points to direct families
- Information to be in multiple formats including digital and paper based, translated into multiple languages with accompanying Easy English versions to increase accessibility
- Where possible employ bi-cultural workers to support families to find information and linkages to their chosen service and create warm referrals
- Ensure families who have sought help are linked into services, and not left without any follow up once information is handed out
- Embed disability liaison officers in mainstream services to smooth referral pathways
- Strengthen the current services we have available, for very young children, to provide reliable evidence-informed information and connections early. Examples include pediatricians, GPs, MCHN, Playconnect, Parent Child Mother Goose, Strengthening Parent Support Program
- Upskill MCHN to use a Best Practice approach when working with families who have concerns about their child's development, so they don't feel like they are failing as their child does not meet the milestones in the book
- Strengthen peer to peer services to connect families and reduce social isolation
- A central place to find links to evidence informed resources such as [Toolkit: Inclusion is Everyone's Business - Early Childhood Intervention Australia Victoria/Tasmania](#)
- Establish a central intake point for families to talk to a skilled clinician about their needs with support to navigate our complex service systems. It must be locally relevant information
- Ensure First Nations and CALD children and families receive services that are culturally competent and provide cultural safety for all
- A 'no wrong door' approach that provides consistent information which reduces confusion and time wasted in the referral process
- Reinstate community-based groups run by allied health staff and peer workers. Leveraging off the allied health practitioner expertise will lead to early identification, and share evidence informed strategies based on research, combined with peer support from another parent/carer
- Utilise group-based training for parents/carers/kin to build capacity and decrease social isolation
- Establish layered supports, so children and families are able to access the right supports as their needs change

Eligibility

Eligibility for our current systems is based upon discrete criteria and assessments. Without our current systems being connected, a parent can be asked for evidence of their child's challenges or diagnosis at least five times from birth to starting school. At each of these points the information requested can be different yet the same, with its purpose to evidence developmental concerns, delay or disability. The way in which the same evidence is required to be presented, can vary across differing government streams. For example, an assessment report for NDIS is different to one for accessing Inclusion Supports in primary school. This creates additional time and associated cost either for the family or NDIS packages. The NDIS does not fund the cost of all diagnostic assessments, nor does Medicare. The gap falls to families. For many families this is not a cost they can incur and instead their children sit on public waitlists for years waiting for free assessments.

With the introduction of Foundational Support categories there will be additional eligibility requirements to determine the level of support a child and family may need.

The requirement to evidence their child's differences can become overwhelming for children and families. The current approach to the cost of assessments and extensive waitlists often means families either pay privately if they can, or miss out as they can't afford to pay the gap. A significant cohort of children and families are either missing out on services and supports, or their access is delayed, and precious intervention time is lost.

Recommendations:

- Adopt a universal 'passport' approach as described by Association for Children with a Disability that allows access to all services. With collaboration between government funding streams and consent from families red tape can be reduced. If more assessment is needed it is in addition to, not re-done
- Fund the total cost of assessments and reports to allow universal access to multi-disciplinary diagnostic teams for timely assessment and diagnosis
- Clearly define the eligibility criteria for all tiers of support and across all government funded programs; health, education, NDIS, and Foundational Supports
- Ensure residency and visa status does not deny access to supports

Early identification

The first 2000 days of a child's life are critical³. Early identification of a child's development moving away from typical norms is vital to ensure children and families access the appropriate supports in a timely manner⁴. ECIA VIC/TAS are aware that many children are not accessing supports as a result of disengagement from services, lack of information and support to engage, and the administration burden now needed to navigate our current service systems.

Recommendations:

- Strengthen current frontline services so workers identify and act on 'red flags' on first presentation rather than a wait-and-see or failure to reach a milestone approach
- Provide detailed information on Foundational Supports to 'first touch-point' referrers such as Maternal Child Health Nurses, GPs, Pediatricians, playgroups, and childcare settings for swift referrals
- Increase training to health professionals on child development to identify children at risk as early as possible
- Increase access to multi-disciplinary developmental assessment teams through the public systems so children are assessed quickly
- Increase subsidies to cover the full cost of assessments so families are not out of pocket
- Share assessment information through the universal 'passport' as described by Association for Children with a Disability, so parents only tell their story once when engaging services

³ Center on the Developing Child at Harvard University (2016). From Best Practices to Breakthrough Impacts: A Science-Based Approach to Building a More Promising Future for Young Children and Families.

<http://www.developingchild.harvard.edu>

⁴ The Lancet Volume 404, Issue 10467.2024. The next 1000 days: the forgotten ages of child health.

www.thelancet.com

Workforce

The introduction to the NDIS has seen significant changes to the landscape for providers and participants alike. An increase in private allied health providers and reduction in best practice providers has occurred. Recruitment and retention of workers throughout the sector continues to be extremely challenging, with an imbalance between experienced workers and new graduates. Competition with community health and the hospital sector is significant, with universities unable to supply the market demand.

In 2016 the NDIA commissioned the National Guidelines Best Practice in Early Childhood Intervention. The guidelines documented the seven key principles and five quality indicators that comprise Best Practice. Documenting Best Practice served multiple purposes including guiding service providers in their models of service delivery, and evidencing to stakeholders what Best Practice should look like. The current review being undertaken by the consortium including Professionals and Researchers in Early Childhood Intervention (PRECI) is welcomed by ECIA VIC/TAS. We anticipate updated guidelines, additional frameworks, tools, and resources to guide the workforce in delivering Best Practice approaches. ECIA VIC/TAS views that Foundational Supports will be underpinned by the updated guidelines and framework, with opportunities to implement Best Practice approaches in both general and targeted supports.

To deliver all elements of Foundational Supports a highly skilled, experienced, and valued workforce will be needed. This includes peer to peer workers, navigators, through to allied health and early childhood intervention professionals. Recruitment and retention of workers for all roles will need to be targeted, well planned and well timed. There is a significant risk during this transition period, where uncertainty abounds, that a proportion of the current workforce will leave and move to other sectors. This will place additional strain on the already stretched workforce.

Specialist teachers have always been an essential part of service delivery for children with developmental delay, concern or disability. ECIA VIC/TAS has member services employing such teachers under a Key Worker model in transdisciplinary teams. Their knowledge of child development and how to work in a strength-based way with families aligns with Best Practice approaches. ECIA VIC/TAS encourages governments to work collaboratively to address the chronic workforce shortages and ensure that reforms are underpinned by Best Practice as will be documented in the PRECI work. To attract, retain and sustain the current workforce and the additional workforce that will be needed to deliver Foundational Supports ECIA VIC/TAS offers the following recommendations.

Recommendations:

- Provide ongoing professional development and mentoring based on current research to ensure evidence informed approaches are used
- Ensure that training for all professionals delivering Foundational Supports includes cultural competency and cultural safety
- Ensure skilled professionals are available to all children in all settings and locations. This includes home, community, education, and early intervention settings
- Support the integration of services between education, health, and Foundational Supports
- Ensure systems that support families with vulnerabilities including child protection, community and family support services are upskilled in navigation of all systems and referral options, to assist with integration of all systems
- Co-design programs with professionals and peer workers to maximise both skill sets

- Implement a multitiered system of supports with defined qualifications, skills and experience that draws upon lived experiences, and research for service delivery
- Build in time for a Key Worker to explore and document the goals, outcomes, and programs that a parent/carer/kin may need to access. Spending time mapping this out in twelve-month blocks creates realistic expectations of what may be achieved and sequential learning for child and adults. Planning early, will provide continuity and reduce time spent searching for programs.
- Employ teachers alongside other allied health professionals in Key Worker roles to deliver Best Practice services
- Utilise existing services. In Victoria, registered providers and community health services are delivering services under multiple funding streams, NDIS, DE, Medicare and private health. These services are well placed to add Foundational Supports, having a workforce, systems and processes already in place
- Address rural and remote thin markets with fresh approaches to the use of allied health assistants working under the supervision of allied health and specialist teachers. Intensive training for workers, focused on skill development and collaboration, can make use of local labour markets in a well-supported way
- Invest in paid student placements for all disciplines able to deliver NDIS and Foundational Supports to attract new workers to the sector
- Develop micro-credentials co-designed with the sector for tertiary students to complete before they begin working. This will strengthen their understanding of developmental delay and disability and reduce the time spent upskilling new graduates in the field

Quality and Safety

ECIA VIC/TAS members regularly highlight the importance of, and the interplay between, providing Best Practice services and quality and safety. A quality service in Early Childhood Education and Care and Early Childhood Intervention looks at a child in the context of their family and builds skills and capacity for both. Building capacity is vital, but it does not mean a child's developmental delay or disability may no longer exist. As skills are mastered, there is more to master on the horizon, which may or may not require input from others. Building capacity is about seeking long-term outcomes which require longer term approaches and relationships. Low intensity and periodic interventions that are episodic in nature, devoid of family context may not lead to long term outcomes.

Delivering quality services requires well-trained, well-resourced workers. Where possible, aligning services to existing hubs, community services, or Best Practice providers offers opportunities to increase the level of quality through collaboration, and wrap around programs. Not-for-profit services delivering Best Practices, working under the National Guidelines are an example where the model provides assurances around quality and safety.

The Worker Registration taskforce convened following the NDIS Review has identified systems that will support an increase in quality within NDIS service delivery. There is a substantial opportunity to align with this work, to support providers to evidence their level of quality within their service delivery model. It will be important to reference other relevant frameworks, such as the Early Years Strategy, Disability Standards for Education, Child Safe Standards and the National Children's Mental health and Wellbeing Strategy.

Quality services operate where children live, learn and play. A workforce that supports this needs to know that when working in community settings there will be systems to guarantee workforce safety. When services are delivered at the right time, right place and in combination with a well-planned sequence of other supports, parents/carers/kin report positive outcomes for the whole family. A program of supports, previously known in Victoria as a Family Service and Support Plan, documented the chosen goals, desired outcomes and services that will be needed to achieve them.

Recommendations:

- Align with the PRECI group findings and implement systems for accountability
- Ensure funding to deliver services in community/home environments covers the true cost of delivery
- Work with the NDIS Worker Registration Taskforce to identify opportunities to streamline a registration system, utilizing registration bodies that already exist. It is important to consider the already high administration burden for providers and not add to this
- Leverage current registered NDIS providers to deliver Key Worker and allied health supports where they already have quality and safety systems in place
- Provide key intake points where there are skilled workers to capture information.
- Ensure ongoing consultation with the sector at all stages to support an iterative approach to the design and implementation of Foundational Supports
- Provide funding leads to a sustainable and stable sector
- Provide a combined approach where children and their parents access group programs at the same time. This can reduce family disruption and commitment. Alternatively, fund these programs to run after hours, with support for parents to attend and the workforce to deliver them without financial burden of overtime payments

Targeted Supports

The delivery of well-structured Targeted supports will enable children and families to move through coordinated, well-timed programs where they have access to a range of expertise. To maximise outcomes, a focus on longer-term working relationships is needed. However, there is a risk of fragmentation in learning, with skills that are not generalized to all settings. Careful planning alongside an experienced worker, such as a Key Worker will reduce this risk and provide a sequenced approach based on realistic goals. Programs such as Hanen, Circle of Security, and Tuning into Kids are all evidence informed programs that build parental capacity. When part of a tailored long-term approach to intervention, they will be highly beneficial and have long-lasting effects.

Capacity Building for the ECEC sector to participate in Targeted supports will be needed. Programs such as School Readiness Funding, Preschool Field Officers and Kindergarten Inclusion Support are essential to building inclusive education. However, these programs do not transfer learnings to the community and home settings and therefore are classified as inclusive programs rather than Targeted Foundational Supports.⁵

Targeted Foundational Supports present an opportunity to re-visit greater collaboration across sectors, to plan complimentary interventions, sequence capacity building approaches and generalize skills across home, community and education. This has largely been lost as a result of the NDIS, and along with it, the ability to leverage off both sectors knowledge for the benefit of child and family.

Recommendations:

- Provide a guaranteed minimum level of funding to ensure providers can plan and staff programs long term
- Family complexity requires funding that enables workers to support the whole family, not just the child
- Align service delivery to the findings and recommendations of the Best Practice review by PRECI et al
- Fund collaboration with Early Childhood Education and Care (ECEC) sector so that Targeted Foundational Supports work in tandem with ECEC and create consistency across settings
- Interpreters should be available at all times to support communication
- Make use of group programs run by early childhood intervention professionals to target specific outcomes for children
- Ensure skills learnt through intentional teaching or interventions are generalized to all environments
- Ensure First Nations and CALD children and families receive services that are culturally competent and provide cultural safety for all
- Design clear pathways for how children may move between the multitiered levels of supports
- Ensure all children receive therapeutic, play based interventions that are linked to specific child and family goals

⁵ Based on comments contained in an unpublished document (2024) Foundational Supports vs Inclusive Education: Differentiating their roles, prepared by John Forster, CEO Noah's Ark, prepared for VCaFSA

Communication

A smooth transition to Foundational Supports is desired by both the workforce and families. Accessing services at the right time and the right place will require clear and concise communication plans. ECIA VIC/TAS members spoke often of the need to communicate the changes using a multimodal approach; print, digital, and spoken forms for all key messages, with repetition over time. The use of techniques such as Easy English and visual representations can enhance communication for a range of cohorts such as CALD communities and parents with a disability or low literacy levels. In early intervention practice the approach of 'little and often' is widely used to convey key messages. There are many changes, parents/cares/kin will need to be tuned into with changes occurring in multiple intersecting sectors, and information from one sector may be required for another.

Recommendations:

- Work with the sector to devise communication plans that are tailored for all cohorts
- Upskill the sector prior to the rollout so they may be an effective communication partner during the implementation
- Use of a wide variety of tools to share information including but not limited to interpreters, print and digital media forms, Easy English, bi-cultural workers embedded in programs and part of the navigational processes
- Design messaging that targets specific cohorts such as First Nations and CALD communities
- Where appropriate design systems to share information across services/sectors to reduce the number of times a parent must tell their story
- Implement connected data systems, to reduce intake processes

Considerations for implementation

ECIA VIC/TAS looks forward to working closely with governments to design and implement Foundational Supports for all children and specifically for children with developmental concern, delay and/or disability and their families, carers, kin. As the peak body representing providers and families, we are keen to collaborate on projects during the transition.

We offer the following points for consideration:

- Continue to consult with a wide variety of sector stakeholders in an iterative approach to implementation
- Develop a comprehensive Stakeholder Communication Plan that informs the sector of changes before families. The sector can then become a solid communication partner and assist in a smooth transition
- Set clear timelines that are communicated to the sector in advance to give them time to make adjustments to systems and processes and be ready to deliver differently
- Consider additional roles such as Disability Liaison officers as used in the health system
- Consider Disability Inclusion leaders in ECEC to provide strong leadership and assist with embedding the new approaches
- This reform encompasses all governmental departments where children and families are present. Most of these are engaged in reforms. At this very busy time of reform, work collaboratively across governmental systems keeping child and family at the center of all reforms